

JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
David G. Heiman (*pro hac vice* pending)
Carl E. Black (*pro hac vice* pending)
Thomas A. Wilson (*pro hac vice* pending)

*Proposed Attorneys for Debtors
and Debtors in Possession*

HUNTON & WILLIAMS LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Tyler P. Brown (VSB No. 28072)
J.R. Smith (VSB No. 41913)
Henry P. (Toby) Long, III (VSB No. 75134)
Justin F. Paget (VSB No. 77949)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

Alpha Natural Resources, Inc., et al.,

Debtors.

Chapter 11

Case No. 15-33896 (KRH)

(Joint Administration Requested)

NOTICE OF CHAPTER 11 FILING AND OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE THAT:

1. On August 3, 2015, Alpha Natural Resources, Inc. and certain of its direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the "Debtors"), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of Virginia (the "Court").

2. Together with their petitions, the Debtors also filed and requested a prompt Court hearing (the "First Day Hearing") on certain first day motions (collectively, the "First Day Motions") identified on the proposed First Day Agenda attached hereto.

3. The Court has scheduled the First Day Hearing for **August 4, 2015, at 11:00 a.m.**, in Courtroom 5000 of the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, 5th Floor, Richmond, Virginia 23219. The First Day Hearing may be adjourned from time to time without further notice other than an announcement at the First Day Hearing.

4. A copy of each of the First Day Motions can be viewed on the Court's website <https://ecf.vaeb.uscourts.gov> or free of charge at <http://www.kccllc.net/alpharestructuring>.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in these bankruptcy cases. (If you do not have one in these bankruptcy cases, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the First Day Motions, or if you want the Court to consider your view on the First Day Motions, you or your attorney must attend the First Day Hearing. **If you or your attorney do not attend the First Day Hearing, the Court may grant the relief requested in the First Day Motions.**

Dated: August 3, 2015
Richmond, Virginia

Respectfully submitted,

/s/ J.R. Smith

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Chapter 11

Case No. 15-33896 (KRH)

(Joint Administration Requested)

PROPOSED FIRST DAY AGENDA

Location of Hearing: Courtroom of the Honorable Kevin R. Huennekens, Courtroom
5000 of the United States Bankruptcy Court for the Eastern District
of Virginia, Richmond Division, 701 East Broad Street, 5th Floor,
Richmond, Virginia 23219.

I. Introduction

Introductory Presentation

1. **"Pro Hac Vice Motions"** — Motion For Admission to Practice, *Pro Hac Vice*, Under Local Bankruptcy Rule 2090-1(E)(2) (Final Order);
2. **"First Day Declarations"**
 - a. Declaration of Kevin S. Crutchfield, Chief Executive Officer and Chairman of the Board of Directors of Debtor Alpha Natural Resources, Inc., in Support of First Day Pleadings of Debtors and Debtors in Possession; and
 - b. Declaration of Philip J. Cavatoni, Executive Vice President & Chief Financial and Strategy Officer of Debtor Alpha Natural

Resources, Inc., in Support of First Day Pleadings of Debtors and Debtors in Possession;

3. **"Joint Administration"** — Motion of the Debtors, Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure, for an Order Directing the Joint Administration of their Chapter 11 Cases (Final Order);

II. First Day Matters

Procedural and Administrative Pleadings

4. **"Consolidated Lists"** — Motion of the Debtors and Debtors in Possession, Pursuant to Sections 342 and 521(a) of the Bankruptcy Code, and Bankruptcy Rules 1007(a), 2002(a) and 2002(f) and Local Bankruptcy Rules 1007-1 and 2002-1 for an Order (A) Waiving the Requirement that Each Debtor Submit a Formatted Mailing Matrix, (B) Approving the Form and Manner of Notice of the Commencement of the Debtors' Chapter 11 Cases and (C) Authorizing the Filing of a Consolidated List of Top 50 Unsecured Creditors (Final Order);
5. **"Extension for Time to File Schedules"** — Motion of the Debtors for Entry of an Order, Pursuant to Sections 105 and 521 of the Bankruptcy Code, Bankruptcy Rules 1007, 2002, 2015.3 and 9006 and Local Bankruptcy Rule 1007-1 (I) Extending the Time Within Which They Must File Their (A) Schedules of Assets and Liabilities, (B) Schedules of Executory Contracts and Unexpired Leases, (C) Statements of Financial Affairs and (D) Rule 2015.3 Financial Reports; and (II) Waiving Requirement of Filing a List of Equity Security Holders and Providing Notice of Commencement to Equity Security Holders (Final Order);
6. **"Case Management"** – Motion of the Debtors for Entry of an Order Establishing Certain Notice, Case Management and Administrative Procedures (Final Order);
7. **"Claims and Noticing Agent"** — Application of the Debtors, Pursuant to Section 105(a) of the Bankruptcy Code, 28 U.S.C. § 156(c) and Bankruptcy Rule 2002, for an Order Authorizing Retention and Employment of Kurtzman Carson Consultants, LLC as Claims, Ballot and Noticing Agent, *Nunc Pro Tunc* to the Petition Date (Final Order);
8. **"Automatic Stay"** — Motion of the Debtors and Debtors in Possession, Pursuant to Section 105 of the Bankruptcy Code, for an Order (A) Confirming the Protections of Sections 362, 365 and 525 of the Bankruptcy Code and (B) Granting Certain Related Relief (Final Order);
9. **"Trading Motion"** — Motion of the Debtors Pursuant to Sections 105, 362 and 541 of the Bankruptcy Code, for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of

Equity Securities, (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors' Estates and (III) Granting Related Relief (Interim Order);

Pleadings Regarding Employee Matters

10. **"Employee Wages and Benefits"** — Motion of Debtors for Interim and Final Orders Authorizing Them to: (A) Pay Prepetition Employee Compensation and Business Expenses; (B) Pay and Honor Employee Medical and Other Benefits; (C) Make Employee Payroll Deductions and Pay Payroll Taxes; (D) Continue Employee Wage and Benefits Programs; and (E) Pay All Costs and Expenses Incident to Any of the Foregoing (Interim Order);

Pleadings Regarding Business Operations of the Debtors

11. **"Taxes"** — Motion of the Debtors, Pursuant to Sections 105(a), 363(b), 507(a) and 541 of the Bankruptcy Code, for Interim and Final Orders Authorizing Them to Pay Certain Prepetition Taxes (Interim Order);
12. **"Insurance"** — Motion of Debtors for Interim and Final Orders Authorizing the Debtors to (I) Maintain, Continue and Renew Their Property, Casualty, Liability, Workers' Compensation and Other Insurance Programs, Policies and Agreements and (II) Honor All Obligations in Respect Thereof (Interim Order);
13. **"Surety Bonds"** — Motion of the Debtors, Pursuant to Sections 363 and 364 of the Bankruptcy Code, for Interim and Final Orders (A) Authorizing the Debtors to Maintain, Continue and Renew their Surety Bond Program and (B) Granting Certain Related Relief (Interim Order);
14. **"Utilities"** — Motion of the Debtors, Pursuant to Section 366 of the Bankruptcy Code, for Interim and Final Orders Establishing Adequate Assurance Procedures with Respect to Their Utility Providers (Interim Order);
15. **"Vendor Comfort"** — Motion of the Debtors for an Order, Pursuant to Sections 105(a), 363(c) and 503(b)(1)(A) of the Bankruptcy Code, Confirming the Administrative Expense Priority Status of the Debtors' Undisputed Obligations for the Postpetition Delivery of Goods and Provision of Services (Final Order);
16. **"Essential Suppliers"** — Motion of the Debtors, Pursuant to Section 105(a), 363(b) and 503(b)(9) of the Bankruptcy Code, for Interim and Final Orders Authorizing Them to Pay Prepetition Claims of Certain Essential Suppliers and Service Providers (Interim Order);

17. **"Lienholders"** — Motion of the Debtors, Pursuant to Sections 105(a) and 363 of the Bankruptcy Code, for Interim and Final Orders Authorizing Them to Pay Prepetition Claims of Certain Lien Claimants (Interim Order);
18. **"Customer Obligations"** — Motion of the Debtors, Pursuant to Sections 105(a) and 363 of the Bankruptcy Code, for Interim and Final Orders Authorizing Them to Pay Prepetition Obligations to Their Customers (Interim Order);
19. **"Coal Sale Contracts"** — Motion of the Debtors for Interim and Final Orders (A) Authorizing the Debtors to Enter Into and Perform Under Coal Sale Contracts and (B) Granting Certain Related Relief (Interim Order);
20. **"503(b)(9) Procedures"** — Motion of the Debtors, Pursuant to Sections 105(a) and 503 of the Bankruptcy Code and Bankruptcy Rules 3002 and 3003, for an Order Establishing Procedures to Resolve Claims Arising Under Section 503(b)(9) of the Bankruptcy Code (Final Order);
21. **"Reclamation Procedures"** — Motion of the Debtors, Pursuant to Sections 105(a), 362 and 546(c) of the Bankruptcy Code and Bankruptcy Rule 9019(b), for an Order Establishing Procedures for Resolving Reclamation Claims Asserted Against the Debtors (Final Order);

Cash Management and Financing Motions

22. **"Cash Management"** — Motion of the Debtors, Pursuant to Sections 345, 363(c)(1), 364 and 503(b)(1) of the Bankruptcy Code and Bankruptcy Rules 6003(b) and 6004(h), for Interim and Final Orders: (A) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms; (B) Granting an Interim Waiver of the Requirements of Section 345(b) and Certain of the U.S. Trustee's Operating Guidelines; (C) Permitting Continued Intercompany Transactions; and (D) Preserving and Permitting the Exercise of Intercompany Setoff Rights; and (E) Authorizing Banks to Honor Certain Transfers and Charge Certain Fees and Other Amounts (Interim Order).
23. **"Motion to Seal"** — Motion of the Debtors Pursuant to Sections 105 and 107 of the Bankruptcy Code and Bankruptcy Rule 9018, to File Under Seal Exhibit F to the Debtors' Motion to Obtain Postpetition Financing (Final Order); and
24. **"DIP Motion"** — Motion for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Pre-Petition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (Interim Order);

Dated: August 3, 2015
Richmond, Virginia

Respectfully submitted,

/s/

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